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IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF WYOMING  
 CASPER DIVISION

THE TRIAL LAWYERS COLLEGE, a )  
 nonprofit corporation )

Plaintiff, )

v. )

GERRY SPENCES TRIAL LAWYERS )  
 COLLEGE AT THUNDERHEAD )  
 RANCH, a nonprofit corporation, and )  
 GERALD L. SPENCE, JOHN ZELBST, )  
 REX PARRIS, JOSEPH H. LOW, KENT )  
 SPENCE, and JOHN DOE, individuals. )

Defendants.

CIVIL ACTION NO. 1:20-cv-0080

**JUDGE CARSON**

**MAGISTRATE JUDGE CARMAN**

**TLC AND THE BOARD MEMBERS' MOTION FOR SUMMARY JUDGMENT**

**NOW INTO COURT**, through undersigned counsel, comes Plaintiff the Trial Lawyers College ("Plaintiff" or "TLC") and Third Party Defendants John Sloan, Milton Grimes, Maren Chaloupka, James R. Clary, Jr., Dana Cole, and Anne Valentine (collectively, the "Board Members"), who respectfully request that this Court grant their motion for summary judgment as to Defendants Gerry Spence ("Spence") and Rex Parris's ("Parris") counterclaims and third party demands in this matter. As set forth extensively in TLC and the Board Members' accompanying memorandum, each of Spence and Parris's seven counterclaims/third party demands suffer from a variety of factual and legal deficiencies, and TLC and the Board Members are entitled to summary judgment dismissing those counterclaims/third party demands with prejudice.

Respectfully submitted,

**THE TRIAL LAWYERS COLLEGE**

/s/ Christopher K. Ralston

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DEFENDANTS JOHN SLOAN, MILTON  
GRIMES, MAREN CHALOUPKA, JAMES R.  
CLARY, JR., DANA COLE, AND ANNE  
VALENTINE**

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copy of the foregoing document has been served electronically by transmission to an electronic filing service provider for service through the Court's CM/ECF system to all parties on June 1, 2021.

/s/ Christopher K. Ralston  
Christopher K. Ralston